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January 19, 2018

VIA EMAIL

The Honorable Brenda P. Murray
Chief Administrative Law Judge
U.S. Securities and Exchange Commission
100 F. Stree, N.E.
Mail Stop 1090
Washington, D.C. 20549

Re: In the Matter of Donald J. Anthony, Jr., et al.
Administrative Proceeding File No. 3-15514

ANDREW GUZZETTI BRIEF ON REMAND

Dear Chief Judge Murray:

This law firm represents Mr. Andrew Guzzetti. We are submitting his letter as Mr. Guzzetti's submission to Your Honor in response to the Commission's order dated November 30, 2017 (the "November 30 Order"), in which the Commission attempts to address the deficiencies inherent in these proceedings by attempting to "ratify" the alleged appointment of its ALJs nearly four years after the conclusion of hearings in this administrative proceeding.

Mr. Guzzetti objects to this procedure in its entirety and by making this submission does not consent to the Commission's alleged ratification of the appointment of the ALJ, or Your Honor's "reexamination" of the record of a hearing that occurred 4 years ago, consumed three weeks of hearings and testimony with untold evidentiary rulings.

Aside from the passage of time, the vain attempt to correct constitutional deficiencies in the process is additionally troubling as there is a pending appeal of the decision in this matter, which was argued in August of last year. While the purported

remand is deficient, the Commission's remand of this matter, for reconsideration is unworkable and unrealistic.

Mr. Guzzetti was alleged to be the supervisor of the other respondents, and despite ample evidence to the contrary, including written procedures identifying the actual supervisors, Your Honor found that he was the supervisor of the representatives. The allegations against Mr. Guzzetti are based upon the allegations against the other respondents, and the procedural and constitutional arguments of the other respondents apply with equal force to Mr. Guzzetti.

Therefore, rather than repeat the arguments and discussions of the other respondents, we adopt and incorporate the arguments of respondents Rabinovich and Mayer, as set forth in their Letter Brief of January 18, 2017. We also adopt and incorporate our prior briefs and memoranda submitted in this matter, as well as our appellate filings before the Commission.

Based on the record, the Appeal Briefs, and this letter brief, the proceeding should be dismissed against Andrew Guzzetti.

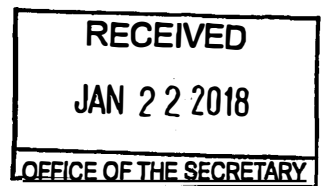
Respectfully,

s/ Michael D. Handelsman

Michael D. Handelsman

cc: All Counsel of Record (By Email)

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January 19, 2018

VIA FEDERAL EXPRESS AND FAX

Mr. Brent J. Fields
Office of the Secretary
U.S. Securities and Exchange Commission
100 F. Stree, N.E.
Mail Stop 1090
Washington, D.C. 20549

Re: In the Matter of Donald J. Anthony, Jr., et al.
Administrative Proceeding File No. 3-15514

Dear Mr. Fields:

This firm represents Respondent Andrew Guzzetti in the above referenced matter. Enclosed you will find three (3) copies of Mr. Guzzetti's Brief on Remand. We respectfully request that the enclosed letter brief be posted on the docket. Should you have any questions, please contact the undersigned at our Verona, New Jersey office.

Respectfully,

s/ Michael D. Handelsman

Michael D. Handelsman

cc: Hon. Brenda P. Murray (By Email)
All Counsel of Record (By Email)